

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK et al.,

Plaintiffs,

v.

NATIONAL SCIENCE FOUNDATION; BRIAN
STONE, in his official capacity as Acting Director
of the National Science Foundation,

Defendants.

Case No. 25-4452

DECLARATION OF JESSICA RANUCCI

JESSICA RANUCCI, an attorney duly admitted to practice before the Courts of this State, does hereby state the following under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am Jessica Ranucci, Special Counsel in the Office of the Attorney General for the State of New York, who appears on behalf of the State of New York in this action.

2. I submit this declaration in support of Plaintiffs States' Motion for a Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65. The facts set forth herein are based upon my personal knowledge and/or a review of the files in my possession.

3. I have attached hereto this affirmation true and correct copies of the following documents, as noted herein.

4. Attached hereto as "Exhibit 1" is a true and correct copy of the Priority Directive, as published on the NSF website as of May 27, 2025, available at <https://www.nsf.gov/updates-on-priorities>.

5. Attached hereto as "Exhibit 2" is a true and correct copy of the FAQs following the

Priorities Directive as published on NSF website as of May 27, 2025, available at <https://www.nsf.gov/updates-on-priorities#frequently-asked-questions-731>.

6. Attached hereto as Exhibit 3 is a true and correct copy of the Indirect Costs Directive, as published on the NSF website as of May 27, 2025, available at <https://www.nsf.gov/funding/proposal-budget/indirect-costs>.

7. Attached hereto as Exhibit 4 is a table listing the 63 declarations filed by Plaintiffs in support of their motion.

8. Attached hereto as Exhibit 5 is a true and correct copy of the list of grants terminated by NSF as of May 27, 2025, available at <https://www.nsf.gov/updates-on-priorities#frequently-asked-questions-731>.

9. Attached hereto as Exhibit 6 is a true and correct copy of the declaration of Dr. Ganesh Raman, Assistant Vice Chancellor for Research at California State University.

10. Attached hereto as Exhibit 7 is a true and correct copy of the declaration of Jeni Kitchell, Vice Chancellor, Finance & Budget Administration and Controller of California State University.

11. Attached hereto as Exhibit 8 is a true and correct copy of the declaration of Kenneth Christensen, Chancellor of the University of Colorado Denver.

12. Attached hereto as Exhibit 9 is a true and correct copy of the declaration of Cassandra Moseley, Vice President for Research at Colorado State University, relating to the Priority Directive.

13. Attached hereto as Exhibit 10 is a true and correct copy of the declaration of Jieun Lee, Associate Professor of the University of Northern Colorado.

14. Attached hereto as Exhibit 11 is a true and correct copy of the declaration of Justin

Schwartz, Chancellor of the University of Colorado Boulder, relating to the Priority Directive.

15. Attached hereto as Exhibit 12 is a true and correct copy of the declaration of Jeri-Annette Lyons, Associate Vice President of Research at University of Northern Colorado.

16. Attached hereto as Exhibit 13 is a true and correct copy of the declaration of Cassandra Moseley, Vice President for Research at Colorado State University, relating to the Indirect Cost Directive.

17. Attached hereto as Exhibit 14 is a true and correct copy of the declaration of Justin Schwartz, Chancellor of the University of Colorado Boulder, relating to the Indirect Cost Directive.

18. Attached hereto as Exhibits 15 is a true and correct copy of the declaration of Julianne Fowler, Interim Director of Sponsored Programs and Research at Southern Connecticut State University relating to the Priority Directive.

19. Attached hereto as Exhibit 16 is a true and correct copy of the declaration of Julianne Fowler, Interim Director of Sponsored Programs and Research at Southern Connecticut State University, relating to the Indirect Cost Directive.

20. Attached hereto as Exhibit 17 is a true and correct copy of the declaration of Dr. Pamir Alpay, Vice President for Research, Innovation, and Entrepreneurship at the University of Connecticut.

21. Attached hereto as Exhibit 18 is a true and correct copy of the declaration of Laura Cisneros, Associate Extension Professor at the University of Connecticut.

22. Attached hereto as Exhibits 19 is a true and correct copy of the declaration of Dr. Miguel Garcia-Diaz, Vice President for Research, Scholarship, and Innovation at the University of Delaware.

23. Attached hereto as Exhibit 20 is a true and correct copy of the declaration of Lui Hokoana, Chancellor of University of Hawai'i Maui College.

24. Attached hereto as Exhibit 21 is a true and correct copy of the declaration of Misaki Takabayashi, Chancellor of Kapi'olani Community College.

25. Attached hereto as Exhibit 22 is a true and correct copy of the declaration of Michael Bruno, Provost of the University of Hawai'i at Manoa.

26. Attached hereto as Exhibit 23 is a true and correct copy of the declaration of Bonnie Irwin, Chancellor of the University of Hawai'i at Hilo.

27. Attached hereto as Exhibit 24 is a true and correct copy of the declaration of Vassilis Syrmos, Vice President for Research and Innovation at the University of Hawai'i.

28. Attached hereto as Exhibit 25 is a true and correct copy of the declaration of Edmundo Garcia-Solis, Associate Provost at Chicago State University.

29. Attached hereto as Exhibit 26 is a true and correct copy of the declaration of Chris Botanga, Professor of Genetics & Genomics and the Executive Director for the Center for STEM Education & Research at Chicago State University.

30. Attached hereto as Exhibit 27 is a true and correct copy of the declaration of Richard Mocarski, Vice President for Research and Innovation Partnerships at Northern Illinois University, relating to the Indirect Cost Directive.

31. Attached hereto as Exhibit 28 is a true and correct copy of the declaration of Richard Mocarski, Vice President for Research and Innovation Partnerships at Northern Illinois University, relating to the Priority Directive.

32. Attached hereto as Exhibit 29 is a true and correct copy of the declaration of Denise Barton, Chief Deputy General Counsel at the University of Massachusetts.

33. Attached hereto as Exhibit 30 is a true and correct copy of the declaration of Dr. Guy Alain Amoussou, Chief Academic Officer, Provost, and Vice President for Academic Affairs of Bowie State University, constituent university of the University of Maryland.

34. Attached hereto as Exhibit 31 is a true and correct copy of the declaration of Karl V. Steiner, Vice President for Research and Creative Achievement at the University of Maryland, Baltimore County.

35. Attached hereto as Exhibit 32 is a true and correct copy of the declaration of Dr. John A. Pelesko, Provost and Senior Vice President for Academic Affairs at the New Jersey Institute for Technology.

36. Attached hereto as Exhibit 33 is a true and correct copy of the declaration of Susannah Porterfield, Vice President of Research at Kean University.

37. Attached hereto as Exhibit 34 is a true and correct copy of the declaration of James P. Holloway, Provost and Executive Vice President for Academic Affairs at the University of New Mexico, relating to the Priority Directive.

38. Attached hereto as Exhibit 35 is a true and correct copy of the declaration of Luis A. Cifuentes, Vice President for Research, Creativity, and Economic Development at New Mexico State University.

39. Attached hereto as Exhibit 36 is a true and correct copy of the declaration of James P. Holloway, Provost and Executive Vice President for Academic Affairs at the University of New Mexico, relating to the Indirect Cost Directive.

40. Attached hereto as Exhibit 37 is a true and correct copy of the declaration of Enrico Pontelli, Dean of the College of Arts and Sciences and a Regents Professor of Computer Science of New Mexico State University.

41. Attached hereto as Exhibit 38 is a true and correct copy of the declaration of David Gillum, Associate Vice President of Compliance and Research Administration of University of Nevada, Reno.

42. Attached hereto as Exhibit 39 is a true and correct copy of the declaration of David Hatchett, Vice President for Research of the University of Nevada Las Vegas, relating to the Priority Directive.

43. Attached hereto as Exhibit 40 is a true and correct copy of the declaration of Adriana Gomez, Associate Director, Financial Management and Compliance in Sponsored Projects at the University of Nevada, Reno.

44. Attached hereto as Exhibit 41 is a true and correct copy of the declaration of David Hatchett, Vice President for Research of the University of Nevada Las Vegas, relating to the Indirect Cost Directive.

45. Attached hereto as Exhibit 42 is a true and correct copy of the declaration of Ben Friedman, Chief Operating Officer of the Research Foundation for the State University of New York.

46. Attached hereto as Exhibit 43 is a true and correct copy of the declaration of Rosemarie Wesson, Associate Vice Chancellor and University Vice Provost for Research at the City University of New York, and Professor of Chemical Engineering at the City College of the City University of New York.

47. Attached hereto as Exhibit 44 is a true and correct copy of the declaration of Dave Martin, Cost Accounting Team Lead at the Research Foundation for the State University of New York.

48. Attached hereto as Exhibit 45 is a true and correct copy of the declaration of

Anshuman Razdan, Vice President for Research and Innovation at Oregon University.

49. Attached hereto as Exhibit 46 is a true and correct copy of the declaration of Richard Tankersley, Vice President for Research and Graduate Studies at Portland State University, relating to the Priority Directive.

50. Attached hereto as Exhibit 47 is a true and correct copy of the declaration of Irem Turner, Vice President for Research and Innovation at Oregon State University, relating to the Priority Directive.

51. Attached hereto as Exhibit 48 is a true and correct copy of the declaration of Joanna Goode, Professor at Oregon University.

52. Attached hereto as Exhibit 49 is a true and correct copy of the declaration of Maxwell Foxman, Assistant Professor in the School of Journalism and Communication at Oregon University.

53. Attached hereto as Exhibit 50 is a true and correct copy of the declaration of Richard Tankersley, Vice President for Research and Graduate Studies at Portland State University, relating to the Indirect Cost Directive.

54. Attached hereto as Exhibit 51 is a true and correct copy of the declaration of Irem Turner, Vice President for Research and Innovation at Oregon State University, relating to the Indirect Cost Directive.

55. Attached hereto as Exhibit 52 is a true and correct copy of the declaration of Bethany D. Jenkins, at the University of Rhode Island.

56. Attached hereto as Exhibit 53 is a true and correct copy of the declaration of David Patrick, Vice Provost for Research and Dean of the Graduate School at Western Washington University.

57. Attached hereto as Exhibit 54 is a true and correct copy of the declaration of Mari Ostendorf, Vice Provost for Research of the University of Washington.

58. Attached hereto as Exhibit 55 is a true and correct copy of the declaration of Jason Young, Principal Research Scientist at the University of Washington Information School.

59. Attached hereto as Exhibit 56 is a true and correct copy of the declaration of Rachel Solemsaas, President of North Seattle College.

60. Attached hereto as Exhibit 57 is a true and correct copy of the declaration of Dr. Jonathan Anderson, Provost and Vice President for Academic Affairs of Eastern Washington University.

61. Attached hereto as Exhibit 58 is a true and correct copy of the declaration of Briana Blaser, Program Operations Specialist at the University of Washington.

62. Attached hereto as Exhibit 59 is a true and correct copy of the declaration of Filberto Barajas-López, Assistant Professor at the University of Washington.

63. Attached hereto as Exhibit 60 is a true and correct copy of the declaration of Amy J. Ko, Professor at the University of Washington.

64. Attached hereto as Exhibit 61 is a true and correct copy of the declaration of Joshua Smith, Senior Associate Vice President for Finance at the Universities of Wisconsin.

65. Attached hereto as Exhibit 62 is a true and correct copy of the declaration of Kristian O'Connor, Interim Vice Provost for Research and Graduate School, and Dean of the University of Wisconsin-Milwaukee, relating to the Indirect Cost Directive.

66. Attached hereto as Exhibit 63 is a true and correct copy of the declaration of Cheryl Bauer-Armstrong, Director of the Earth Partnership Program in the Department of Planning and Landscape Architecture at the University of Wisconsin-Madison.

67. Attached hereto as Exhibit 64 is a true and correct copy of the declaration of Nicole Louie, Associate Professor in the Department of Curriculum and Instruction at the University of Wisconsin-Madison.

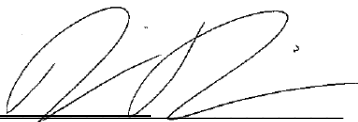
68. Attached hereto as Exhibit 65 is a true and correct copy of the declaration of Carlynn Mueller, Assistant Professor at the University of Wisconsin-Madison.

69. Attached hereto as Exhibit 66 is a true and correct copy of the declaration of Judith Simcox, Assistant Professor at the University of Wisconsin-Madison.

70. Attached hereto as Exhibit 67 is a true and correct copy of the declaration of Dorota A. Grejner-Brzezinska, Vice Chancellor for Research at the University of Wisconsin-Madison.

71. Attached hereto as Exhibit 68 is a true and correct copy of the declaration of Kristian O'Connor, Interim Vice Provost for Research and Graduate School, and Dean of the University of Wisconsin-Milwaukee, relating to the Priority Directive.

Dated: New York, New York
May 28, 2025



Jessica Ranucci